

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
\$57,012 IN UNITED STATES  
CURRENCY, AND ANY ACCRUED  
INTEREST,  
  
Defendant.

CASE NO.

**VERIFIED COMPLAINT  
FOR FORFEITURE *IN REM***

**I. NATURE OF THE ACTION**

1. This is a civil *in rem* action for the forfeiture of \$57,012 in United States currency seized on December 21, 2021 (hereafter, the “Defendant Currency”).

**II. LEGAL BASIS FOR FORFEITURE**

2. The Defendant Currency is forfeitable pursuant to 21 U.S.C. § 881(a)(6) for violations of 21 U.S.C. § 841(a)(1) (unlawful distribution of a controlled substance). Specifically, counsel for the United States has a reasonable belief the government will be able to prove, to a preponderance at trial, that the Defendant Currency represents proceeds from the sale of controlled substances; moneys furnished or intended to be

1 furnished for the purchase of controlled substances; and/or moneys used or intended to be  
2 used to facilitate the unlawful distribution of controlled substances.

### 3 **III. JURISDICTION AND VENUE**

4 3. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1345  
5 (United States is plaintiff) and 1355(a) (action for forfeiture).

6 4. Venue is proper in this Court pursuant to 28 U.S.C. § 1355(b)(1)(A) (acts  
7 giving rise to the forfeiture occurred in this district) and 28 U.S.C. § 1395(b) (the  
8 Defendant Currency was seized in this district).

9 5. A Task Force Officer (“TFO”) with the United States Federal Bureau of  
10 Investigation (“FBI”) and the Seattle Police Department (“SPD”) seized the Defendant  
11 Currency pursuant to a warrant issued by King County Superior Court (the “Warrant”),  
12 which authorized the arrest of David Christopher Pitts and the search of his residence.  
13 Law enforcement executed the Warrant on December 21, 2021. After taking custody of  
14 the Defendant Currency, SPD transferred it to the custody of FBI, where it remains

15 6. As provided in Supplemental Rule G(3)(b)(i), the Clerk of Court is required  
16 to issue a warrant to arrest the Defendant Currency if it is in the government’s possession,  
17 custody, or control. As such, the Court will have *in rem* jurisdiction over the Defendant  
18 Currency when the accompanying Warrant of Arrest *in Rem* is issued, executed, and  
19 returned to the Court.

### 20 **IV. FACTUAL BASIS FOR FORFEITURE**

21 7. On December 13, 2021, King County Superior Court issued the Warrant  
22 authorizing, among other actions, a search of Pitts and his primary residence at 526  
23 Smithers Avenue South, Apartment 4, Renton, Washington.

24 8. On December 21, 2021, law enforcement arrested Pitts and searched his  
25 person and his primary residence.

26 9. Law enforcement seized the Defendant Currency from Pitts’s residence.

27 10. Law enforcement located the Defendant Currency in a safe in the  
28 residence’s primary bedroom. In addition to the Defendant Currency, the safe also

1 contained several plastic containers which held heroin, cocaine, fentanyl, sublingual  
2 suboxone, ketamine, vials of fentanyl from a medical facility, and small blue pills  
3 believed to be counterfeit oxycodone pills laced with fentanyl.

4 11. During the search of Pitts's residence, law enforcement also seized 25  
5 firearms—including pistols, rifles, and shotguns—as well as associated ammunition and  
6 body armor. At the time of seizure, many of the firearms were easily accessible, visible,  
7 and/or loaded, suggesting they were used and/or intended to be used to facilitate the  
8 distribution of controlled substances.

9 12. Law enforcement also seized the following controlled substances from  
10 Pitts's residence:

- 11 a. 3037.8 grams of methamphetamine;
- 12 b. 1666.5 grams of cocaine;
- 13 c. 643.8 grams of fentanyl powder;
- 14 d. 309.6 grams of heroin;
- 15 e. 242.3 grams of Xanax (alprazolam) pills (estimated 2400 pills);
- 16 f. 297.7 grams of M-30 pills, suspected fentanyl (estimated 3000 pills);
- 17 g. 57.8 grams of ketamine powder;
- 18 h. one box containing 25 vials labeled Fentanyl Citrate Injection; and
- 19 i. 19 medical injection vials of liquid labeled as fentanyl.

20 13. Additionally, law enforcement seized various items commonly used to cut  
21 bulk narcotics and package them for resale.

22 14. After the search, law enforcement communicated with the apartment's  
23 property manager, who stated she did not know of anyone else living in the apartment  
24 since Pitts took over the lease.

25 15. On April 6, 2022, a federal grand jury returned a three-count Indictment  
26 charging Pitts with Possession of Controlled Substances with Intent to Distribute, in  
27 violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), (b)(1)(B), and (b)(1)(E)(2) (Count 1);  
28 Possession of a Firearm in Furtherance of a Drug Trafficking Crime, in violation of 18

U.S.C. § 924(c)(1)(A)(i) (Count 2); and Unlawful Possession of a Firearm, in violation of  
18 U.S.C. § 922(g)(1) (Count 3).

**V. REQUEST FOR RELIEF**

As required by Supplemental Rule G(2)(f), the facts set forth in this Verified  
Complaint support a reasonable belief that the United States will be able to meet its  
burden of proof at trial. More specifically, these facts support a reasonable belief that the  
United States will be able to prove, at trial, that the Defendant Currency represents  
proceeds from the sale of controlled substances; moneys furnished or intended to be  
furnished for the purchase of controlled substances; and/or moneys used or intended to be  
used to facilitate the unlawful distribution of controlled substances, in violation of  
21 U.S.C. § 841(a)(1), which renders it forfeitable pursuant to 21 U.S.C. § 881(a)(6).

WHEREFORE, the United States respectfully requests:

1. A warrant issue for the arrest of the Defendant Currency;
2. That due notice be given to all interested parties to appear and show cause  
why the Defendant Currency should not be forfeited;
3. The Defendant Currency be forfeited to the United States for disposition  
according to law; and,

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1           4.       For such other and further relief as this Court may deem just and proper.  
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3           DATED this 20<sup>th</sup> day of May, 2022.  
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5                               Respectfully submitted,  
6                               NICHOLAS W. BROWN  
7                               United States Attorney

8                               s/Jehiel I. Baer  
9                               JEHIEL I. BAER  
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I, Stephen Knapp, am a Task Force Officer with the Federal Bureau of Investigation in Seattle, Washington. I furnished the investigative facts contained in the foregoing Verified Complaint for Forfeiture *In Rem*. The investigative facts are based on personal knowledge I obtained from my involvement in the underlying investigation, my review of the relevant investigative material, other law enforcement officers involved in the investigation, other reliable official Government sources, and my own training and experience.

I hereby verify and declare, under penalty of perjury pursuant to 28 U.S.C. § 1746, that I have read the foregoing Verified Complaint for Forfeiture *In Rem*, that I know its contents, and that the facts it contains are true and correct to the best of my knowledge.

Executed this 18<sup>th</sup> day of MAY, 2022.

  
STEPHEN KNAPP  
Task Force Officer  
Federal Bureau of Investigation